

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION -CRIMINAL  
COUNTY OF ATLANTIC

STATE OF NEW JERSEY	)	ATLANTIC COUNTY GRAND JURY
v.	)	Superceding Indictment No.
ANDREW HENRY	)	Pros. No. 13-3145
ALEXANDRIA SMITH	)	
JAN CEDENO	)	
KENDUE WYCHE	)	
WAYNE SETTLE	)	
KASEEM HARRIS	)	
JASMINE LANE	)	
MATTHEW HAMILTON	)	
TANASIA STOKELY	)	
JARON MCEACHIN	)	
DARRIELLE WILLIAMS	)	
LATESHA TOWNSEND	)	
HERBERT ODUM	)	
KEVIN BARTHELEMY	)	
ASHLEY EVANS	)	
JANESSA SPAIGHTS	)	
ALISA WALKER	)	
ANTHONY MODESTE	)	
SHAQUANA CRUMP	)	
TYQUAN ROBINSON	)	

STEPHANIE PIERRE	)
GLORIA BUCKNER	)
WILLIE PETTEWAY	)
TANIEKA SCOTT	)
TYRONE FOSTER	)
CHERISH HURLEY	)
JERRELL MITCHELL	)
HECTOR MOLINA	)
TYRONE COBB	)
CRYSTAL RIVERA	)
ROSA CIRINO	)
ESTER HAILU	)
RONNELL OLIVER	)
TY-MEEK THELWELL	)
MARVIN DUMONT	)
CHRISTOPHER ALLARD	)
ISIAH LUNDY	)
BENJAMIN PETTIFORD	)
STEVEN HEROD	)
KAREEM CARTER	)
JERROD ABNEY	)
DANIEL SLADE	)
DARRELL RICHARDSON	)
DASHAWN LYNCH	)

ZULIKA HOSTEN )  
JULIUS ANDERSON )  
ESTERLIN SAMUEL )  
and )  
QUANMIK WELLS )

The Grand Jurors of the County of Atlantic, for the State of  
New Jersey, upon their oaths, present that:

COUNT ONE

(Racketeering - First Degree)

ANDREW HENRY  
ALEXANDRIA SMITH  
JAN CEDENO  
KENDUE WYCHE  
WAYNE SETTLE  
KASEEM HARRIS  
JASMINE LANE  
MATTHEW HAMILTON  
TANASIA STOKELY  
JARON MCEACHIN  
DARRIELLE WILLIAMS  
LATESHA TOWNSEND  
HERBERT ODUM  
KEVIN BARTHELEMY  
ASHLEY EVANS

JANESSA SPAIGHTS  
ALISA WALKER  
ANTHONY MODESTE  
SHAQUANA CRUMP  
TYQUAN ROBINSON  
STEPHANIE PIERRE  
CRYSTAL RIVERA  
GLORIA BUCKNER  
WILLIE PETTEWAY  
TANIEKA SCOTT  
TYRONE FOSTER  
CHERISH HURLEY  
JERRELL MITCHELL  
HECTOR MOLINA  
TYRONE COBB  
ROSA CIRINO  
ESTER HAILU  
RONNELL OLIVER  
TY-MEEK THELWELL  
MARVIN DUMONT  
CHRISTOPHER ALLARD  
ISIAH LUNDY  
BENJAMIN PETTIFORD  
STEVEN HEROD

KAREEM CARTER  
JERROD ABNEY  
DANIEL SLADE  
DARRELL RICHARDSON  
DASHAWN LYNCH  
ZULIKA HOSTEN  
JULIUS ANDERSON  
ESTERLIN SAMUEL  
and  
QUANMIK WELLS

and other persons whose identities are known and unknown to the Grand Jurors, who are co-conspirators and members of the criminal enterprise, but not named as defendants herein, at the times and places herein specified, did commit the crime of racketeering, that is, the defendants and other persons employed by or associated with the enterprise engaged in activities which affected trade or commerce, in the State of New Jersey in that they:

1. Purposely or knowingly did conduct or participate directly or indirectly in the conduct of the enterprise's affairs through a pattern of racketeering activity, contrary to the provisions of N.J.S.A. 2C:41-2c; or

2. With the purpose of promoting or facilitating the commission of the crime of racketeering, did conspire or agree

together and with persons whose identities are known to the Grand Jurors, that:

A. One or more of them would engage in conduct which would constitute the crime of racketeering; or

B. One or more of them would aid in the planning, solicitation or commission of the crime of racketeering, that is, to conduct or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, in violation of N.J.S.A. 2C:41-2d, all as hereinafter described.

#### THE RELEVANT TIMES

The predicate criminal activity occurred between in or about February 1, 2011 and August 27, 2012.

#### THE RELEVANT PLACES

The predicate criminal activity took place at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court.

#### THE ENTERPRISE

ANDREW HENRY, ALEXANDRIA SMITH, JAN CEDENO, KENDUE WYCHE, WAYNE SETTLE, KASEEM HARRIS, JASMINE LANE, MATTHEW HAMILTON, TANASIA STOKELY, JARON MCEACHIN, DARRIELLE WILLIAMS, LATESHA TOWNSEND, HERBERT ODUM, KEVIN BARTHELEMY, ASHLEY EVANS, JANESEA SPAIGHTS, ALISA WALKER, ANTHONY MODESTE, SHAQUANA CRUMP, TYQUAN ROBINSON, STEPHANIE PIERRE, CRYSTAL RIVERA, GLORIA BUCKNER,

WILLIE PETTEWAY, TANIEKA SCOTT, TYRONE FOSTER, CHERISH HURLEY, JERRELL MITCHELL, JERRELL MITCHELL, HECTOR MOLINA, TYRONE COBB, ROSA CIRINO, ESTER HAILU, RONNELL OLIVER, TY-MEEK THELWELL, MARVIN DUMONT, CHRISTOPHER ALLARD, ISIAH LUNDY, BENJAMIN PETTIFORD, STEVEN HEROD, KAREEM CARTER, JERROD ABNEY, DANIEL SLADE, DARRELL RICHARDSON, DASHAWN LYNCH, ZULIKA HOSTEN, JULIUS ANDERSON, ESTERLIN SAMUEL AND QUANMIK WELLS; all of whom are co-conspirators; and other persons whose identities are both known and unknown to the State and are members of the enterprise although not charged herein, did constitute an enterprise within the meaning of N.J.S.A. 2C:41-1c, that is, a group of individuals associated in fact, or associates thereof, for the purposes set forth below.

#### THE PURPOSES OF THE ENTERPRISE

The purposes of the enterprise included the fraudulent takeover of legitimate JP Morgan Chase Bank accounts accomplished as follows: The enterprise had a leadership which financed, organized, supervised, and managed the subordinate members in a common course of conduct to gain access to, and obtain account information from, legitimate business accounts at JP Morgan Chase Bank. In the first stage of the scheme, certain individuals, commonly called "bodies" by the co-conspirators, opened fraudulent small business accounts with JP Morgan Chase Bank. Next, individuals referred to as "add-ons" by the co-conspirators

then posed as the owner/signer of the legitimate JP Morgan Chase Bank business account whose identifying information had been obtained. The "add-on" and the "body" would then complete the proper paperwork with JP Morgan Chase Bank to link the victim's legitimate account to the fraudulent account opened by the "body." The leadership then transferred money without permission from the victim's legitimate account to the fraudulent account. The money would either be wired into Atlantic City casinos where "bodies" would pick it up or the "bodies" would be brought to Atlantic City casinos to withdraw the money from the account through Global Cash Access withdrawals at Atlantic City casinos.

In the second stage of the scheme, a person or persons with information about a victim's JP Morgan Chase Bank business accounts contacted JP Morgan Chase Bank and posed as the legitimate owner of those accounts. During the call, the person posing as the owner of the bank accounts was able to provide all the identifying information necessary to access the accounts. Once access to the account was granted, the person requested additional credit cards for the account, in different names or in the company name, and then asked that they be mailed to a certain address. The credit cards were then picked up from the various addresses and each card would be used by the person whose name was on it to withdraw money without permission from the victim's accounts through Global Cash Access withdrawals at Atlantic City



casinos.

THE PATTERN OF RACKETEERING ACTIVITY

The pattern of racketeering activity, as defined in N.J.S.A. 2C:41-1d, engaged in by members or associates of the enterprise, did consist of at least two incidents of racketeering conduct during the relevant time period stated above, including but not limited to: Theft by Deception (N.J.S.A. 2C:20-4); Money Laundering (N.J.S.A. 2C:21-25); and Conspiracy to commit the foregoing crimes (N.J.S.A. 2C:5-2), primarily in the following ways:

ANDREW HENRY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Two, Three and Six of this indictment.

ALEXANDRIA SMITH

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Four, Five and Six of this indictment.

JAN CEDENO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight

and Nine of this indictment.

KENDUE WYCHE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

WAYNE SETTLE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

KASEEM HARRIS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

JASMINE LANE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

MATTHEW HAMILTON

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

TANASIA STOCKELY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

JARON MCEACHIN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

DARRIELLE WILLIAMS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

LATESHA TOWNSEND

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

HERBERT ODUM

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

KEVIN BARTHELEMY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ASHLEY EVANS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

JANESSA SPAIGHTS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ALISA WALKER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ANTHONY MODESTE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

SHAQUANA CRUMP

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

TYQUAN ROBINSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

STEPHANIE PIERRE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

GLORIA BUCKNER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight

and Nine of this indictment.

WILLIE PETTEWAY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

TANIEKA SCOTT

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

TYRONE FOSTER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

CHERISH HURLEY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

JERRELL MITCHELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money

Laundrying, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

HECTOR MOLINA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundrying, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

TYRONE COBB

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundrying, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

CRYSTAL RIVERA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundrying, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ROSA CIRINO

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundrying, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ESTER HAILU

did commit the racketeering conduct by engaging in or conspiring

to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

RONNELL OLIVER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

TY-MEEK THELWELL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

MARVIN DUMONT

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

CHRISTOPHER ALLARD

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ISIAH LUNDY



did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

BENJAMIN PETTEFORD

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

STEVEN HEROD

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

KAREEM CARTER

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

JERROD ABNEY

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

DANIEL SLADE

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

CRYSTAL RIVERA

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

DARRELL RICHARDSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

DASHAWN LYNCH

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ZULIKA HOSTEN

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight

and Nine of this indictment.

JULIUS ANDERSON

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

ESTERLIN SAMUEL

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

QUANMIK WELLS

did commit the racketeering conduct by engaging in or conspiring to commit repeated acts of Theft by Deception and Money Laundering, all of which is the subject of Counts Seven, Eight and Nine of this indictment.

All in violation of N.J.S.A. 2C:41-2c, N.J.S.A. 2C:41-2d, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Conspiracy - First Degree)

ANDREW HENRY

and other persons whose identities are both known and unknown to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about February 1, 2011, and on or about August 27, 2012, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crimes of first degree Money Laundering and second degree Theft by Deception, did agree together that:

1. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

2. One or more of them knowingly would aid in the solicitation, planning, attempt or commission of said crime, that is:

A. Money Laundering, in that one or more of them would transport or possess property known or which a reasonable person would believe to be derived from criminal activity with a value of \$500,000 or more, or engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with a value of \$500,000 or more, (1) with the intent to facilitate or promote the criminal

activity, or (2) knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b, and

B. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$75,000 or more, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4.

Contrary to the provisions of N.J.S.A. 2C:5-2 and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Money Laundering - First Degree)

ANDREW HENRY

between on or about February 1, 2011, and on or about August 27, 2012, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, did commit the offense of Money Laundering, in that the said ANDREW HENRY, and others whose identities are both known and unknown to the Grand Jurors, did transport or possess property with a value of \$500,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, or did engage in transactions involving property known to be derived from criminal activity with a value of \$500,000 or more, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the criminal activity; that is ANDREW HENRY and others whose identities are known and unknown to the Grand Jurors, did link legitimate JP Morgan Chase bank accounts to fraudulent JP Morgan Chase account, did transfer funds from the legitimate accounts to the fraudulent accounts, did withdraw money from the fraudulent accounts through wire transfers and Global Cash Access

withdrawals at Atlantic City casinos, did contact JP Morgan Chase Bank and pose as the legitimate owners of JP Morgan Chase Bank accounts, did request additional credit cards for the accounts, did withdraw money from the accounts using these credit cards through Global Cash Access withdrawals at Atlantic City casinos, and then used a portion of those funds to pay the individuals who set up the fraudulent accounts or picked up the wires and made the Global Cash Access withdrawals and to perpetuate their ongoing criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Conspiracy - Second Degree)

ALEXANDRIA SMITH

and other persons whose identities are both known to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about February 1, 2011, and on or about September 3, 2011, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crimes of first degree Money Laundering and second degree Theft by Deception, did agree together that:

1. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

2. One or more of them knowingly would aid in the solicitation, planning, attempt or commission of said crime, that is:

A. Money Laundering, in that one or more of them would transport or possess property known or which a reasonable person would believe to be derived from criminal activity with a value of \$75,000 or more, or engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity with a value of \$75,000 or more, (1) with the intent to facilitate or promote the criminal activity, or (2) knowing that the transaction was designed in whole or in part to



conceal or disguise the nature, location, source, ownership or control of the property, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b, and

B. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$75,000 or more, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4.

Contrary to the provisions of N.J.S.A. 2C:5-2 and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Money Laundering - Second Degree)

ALEXANDRIA SMITH

between on or about February 1, 2011, and on or about September 3, 2011, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, did commit the offense of Money Laundering, in that the said ALEXANDRIA SMITH, and others whose identities are both known and unknown to the Grand Jurors, did transport or possess property with a value of \$75,000 or more, known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, or did engage in transactions involving property known to be derived from criminal activity with a value of \$500,000 or more, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the criminal activity; that is ALEXANDRIA SMITH and others whose identities are known and unknown to the Grand Jurors, did link legitimate JP Morgan Chase bank accounts to fraudulent JP Morgan Chase account, did transfer funds from the legitimate accounts to the fraudulent accounts, did withdraw money from the fraudulent accounts through wire transfers and Global Cash Access

withdrawals at Atlantic City casinos, and then used a portion of those funds to pay the individuals who set up the fraudulent accounts or picked up the wires and made the Global Cash Access withdrawals and to perpetuate their ongoing criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Second Degree)

ANDREW HENRY

ALEXANDRIA SMITH

between on or about February 1, 2011, and on or about August 27, 2012, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$75,000 or more, by deception, that is ANDREW HENRY and ALEXANDRIA SMITH, did create or reinforce the false impression that they were the legitimate and authorized account holders of various JP Morgan Chase Bank accounts and were thereby authorized to access, link, transfer funds, and order additional credit cards to withdraw money from said accounts,

WHEREAS IN TRUTH AND IN FACT, as ANDREW HENRY and ALEXANDRIA SMITH well knew, they used the personal identifying information of the authorized JP Morgan Chase bank account holders to unlawfully access, link, transfer funds, and order additional credit cards to withdraw money from said accounts, in an amount in excess of \$75,000, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Conspiracy - Third Degree)

JAN CEDENO

KENDUE WYCHE

WAYNE SETTLE

KASEEM HARRIS

JASMINE LANE

MATTHEW HAMILTON

TANASIA STOKELY

JARON MCEACHIN

DARRIELLE WILLIAMS

LATESHA TOWNSEND

HERBERT ODUM

KEVIN BARTHELEMY

ASHLEY EVANS

JANESSA SPAIGHTS

ALISA WALKER

ANTHONY MODESTE

SHAQUANA CRUMP

TYQUAN ROBINSON

STEPHANIE PIERRE

CRYSTAL RIVERA

GLORIA BUCKNER

WILLIE PETTEWAY

TANIEKA SCOTT  
TYRONE FOSTER  
CHERISH HURLEY  
JERRELL MITCHELL  
HECTOR MOLINA  
TYRONE COBB  
ROSA CIRINO  
ESTER HAILU  
RONNELL OLIVER  
TY-MEEK THELWELL  
MARVIN DUMONT  
CHRISTOPHER ALLARD  
ISIAH LUNDY  
BENJAMIN PETTIFORD  
STEVEN HEROD  
KAREEM CARTER  
JERROD ABNEY  
DANIEL SLADE  
DARRELL RICHARDSON  
DASHAWN LYNCH  
ZULIKA HOSTEN  
JULIUS ANDERSON  
ESTERLIN SAMUEL  
QUANMIK WELLS

and other persons whose identities are both known to the Grand Jurors, who are co-conspirators but not named as defendants herein, between on or about February 1, 2011, and August 27, 2012, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crimes of Theft by Deception and Money Laundering, did agree that:

1. One or more of them knowingly would engage in conduct which would constitute the aforesaid crime, or

2. One or more of them knowingly would aid in the solicitation, planning and commission of said crime, that is:

- A. Theft by Deception, in that one or more of them would purposely obtain the property of another, in the amount of \$500 or more, by deception, by creating or reinforcing a false impression, including a false impression as to law, value, intention or other state of mind, contrary to the provisions of N.J.S.A. 2C:20-4, and

- B. Money Laundering, in that one or more of them would transport or possess property known or which a reasonable person would believe to be derived from criminal activity or engage in a transaction involving property known or which a reasonable person would believe to be derived from criminal activity, (1) with the intent to facilitate or promote the criminal activity, or (2)

knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b.

The Grand Jurors, aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following overt acts, among others, were committed:

#### OVERT ACTS

1. On May 21, 2012, Jan Ceden0 used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Herschel Kulefsky, Inc., to conduct a \$9,473.96 Global Cash Access cash advance.

2. On May 21, 2012, Kendue Wyche used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Herschel Kulefsky, Inc., to conduct \$9,478.96 in Global Cash Access cash advances.

3. On May 20, 2012, Wayne Settle used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Herschel Kulefsky, Inc., to conduct \$9,473.96 in Global Cash Access cash advances.

4. On May 20, 2012, Kaseem Harris used a fraudulently obtained credit card from the JP Morgan Chase Bank account of



Herschel Kulefsky, Inc., to conduct \$9,408.96 in Global Cash Access cash advances.

5. On June 4, 2012, Jasmine Lane used a fraudulently obtained credit card from the JP Morgan Chase Bank account of The Rabbi Dr. Leo Jung Memorial Fund, to conduct \$4,734.89 in Global Cash Access cash advances.

6. On June 4, 2012, Matthew Hamilton used a fraudulently obtained credit card from the JP Morgan Chase Bank account of The Rabbi Dr. Leo Jung Memorial Fund, to conduct \$4,734.89 in Global Cash Access cash advances.

7. On June 20, 2012, Tanasia Stokely used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Repair the World, to conduct \$4,734.98 in Global Cash Access cash advances.

8. On June 19, 2012, Jaron Mceachin used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Repair the World, to conduct \$4,213.98 in Global Cash Access cash advances.

9. On June 19, 2012, Darrielle Williams used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Repair the World, to conduct \$2,104.90 in Global Cash Access cash advances.

10. On June 20, 2012, Latesha Townsend used a fraudulently obtained credit card from the JP Morgan Chase Bank account of

Repair the World, to conduct \$4,733.99 in Global Cash Access cash advances.

11. On June 19, 2012, Herbert Odum used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Repair the World, to conduct \$4,733.4 in Global Cash Access cash advances.

12. On June 11, 2012, Kevin Barthelemy used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Clarity Testing Services, Inc., to conduct \$2,629.99 in Global Cash Access cash advances.

13. On June 11, 2012, Ashley Evans used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Clarity Testing Services, Inc., to conduct \$2,629.99 in Global Cash Access cash advances.

14. On July 1, 2012, Janessa Spaights used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Kalvert MD PC, to conduct \$5,266.98 in Global Cash Access cash advances.

15. On July 1, 2012, Alisa Walker used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Kalvert MD PC, to conduct \$7,366.97 in Global Cash Access cash advances.

16. On July 1, 2012, Anthony Modeste used a fraudulently obtained credit card from the JP Morgan Chase Bank account of

Michael Kalvert MD PC, to conduct \$4,736.98 in Global Cash Access cash advances.

17. On July 2, 2012, Shaquana Crump used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Kalvert MD PC, to conduct \$4,734.98 in Global Cash Access cash advances.

18. On July 1, 2012, Tyquan Robinson used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Kalvert MD PC, to conduct \$7,894.87 in Global Cash Access cash advances.

19. On April 28, 2012, Stephanie Pierre used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Curfin Holding Co. Inc., to conduct \$8,064.97 in Global Cash Access cash advances.

20. On April 28, 2012, Gloria Buckner used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Curfin Holding Co. Inc., to conduct \$7,839.97 in Global Cash Access cash advances.

21. On April 28, 2012, Willie Petteway used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Curfin Holding Co. Inc., to conduct \$12,081.94 in Global Cash Access cash advances.

22. On August 5, 2012, Tanieka Scott used a fraudulently obtained credit card from the JP Morgan Chase Bank account of

Michael Young Realty, Inc., to conduct \$8,844.96 in Global Cash Access cash advances.

23. On August 5, 2012, Tyrone Foster used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Young Realty, Inc., to conduct \$9,262.91 in Global Cash Access cash advances.

24. On August 5, 2012, Cherish Hurley used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Young Realty, Inc., to conduct \$9,689.88 in Global Cash Access cash advances.

25. On August 5, 2012, Jerrell Mitchell used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Michael Young Realty, Inc., to conduct \$9,891.92 in Global Cash Access cash advances.

26. On August 25, 2012, Hector Molina used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Empire Management America Corp., to conduct \$2,529.99 in Global Cash Access cash advances.

27. On August 25, 2012, Tyrone Cobb used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Empire Management America Corp., to conduct \$2,429.99 in Global Cash Access cash advances.

28. On August 25, 2012, Crystal Rivera used a fraudulently obtained credit card from the JP Morgan Chase Bank account of

Empire Management America Corp., to conduct \$7,409.93 in Global Cash Access cash advances.

29. On July 18, 2012, Rosa Cirino used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Allison Wonderland, to conduct \$2,669.93 in Global Cash Access cash advances.

30. On July 18, 2012, Ester Hailu used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Allison Wonderland, to conduct \$6,017.98 in Global Cash Access cash advances.

31. On July 18, 2012, Ronnell Oliver used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Allison Wonderland, to conduct \$4,734.98 in Global Cash Access cash advances.

32. On July 18, 2012, Ty-Meek Thelwell used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Allison Wonderland, to conduct \$1,006.99 in Global Cash Access cash advances.

33. On July 18, 2012, Marvin Dumont used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Allison Wonderland, to conduct \$7,766.93 in Global Cash Access cash advances.

34. On July 18, 2012, Christopher Allard used a fraudulently obtained credit card from the JP Morgan Chase Bank

account of Allison Wonderland, to conduct \$8,937.88 in Global Cash Access cash advances.

35. On July 28, 2012, Isiah Lundy used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Nazareth Regional High School, to conduct \$3,691.98 in Global Cash Access cash advances.

36. On July 28, 2012, Benjamin Pettiford used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Nazareth Regional High School, to conduct \$4,866.98 in Global Cash Access cash advances.

37. On July 28, 2012, Steven Herod used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Nazareth Regional High School, to conduct \$4,864.94 in Global Cash Access cash advances.

38. On July 28, 2012, Kareem Carter used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Nazareth Regional High School, to conduct \$4,836.98 in Global Cash Access cash advances.

39. On August 26, 2012, Jerrod Abney used a fraudulently obtained credit card from the JP Morgan Chase Bank account of Stuart Reiber MD PC, to conduct \$4,959.94 in Global Cash Access cash advances.

40. On August 26, 2012, Daniel Slade used a fraudulently obtained credit card from the JP Morgan Chase Bank account of

Stuart Reiber MD PC, to conduct \$4,734.98 in Global Cash Access cash advances.

41. On February 12, 2011, Darrell Richardson opened up a bank account at JP Morgan Chase Bank in the name of "Richardson's Hair Stylist."

42. On April 6, 2011, Dashawn Lynch opened up a bank account at JP Morgan Chase Bank in the name of "Lynch Electronics."

43. On May 9, 2011, Zulika Hosten opened up a bank account at JP Morgan Chase Bank in the name of "Hosten's Bakery."

44. On August 6, 2011, Quanmik Wells conducted three Global Cash Access withdrawals from the the JP Morgan Chase Bank account of "Nyasia's Graphics and Design."

45. On August 23, 2011, Esterlin Samuel opened up a bank account at JP Morgan Chase Bank in the name of "ES Roofing and Flooring."

46. On September 3, 2011, Julius Anderson conducted two Global Cash Access withdrawals from the JP Morgan Chase Bank account of "ES Roofing and Flooring."

Contrary to the provisions of N.J.S.A. 2C:2-5 and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft by Deception - Third Degree)

JAN CEDENO

KENDUE WYCHE

WAYNE SETTLE

KASEEM HARRIS

JASMINE LANE

MATTHEW HAMILTON

TANASIA STOKELY

JARON MCEACHIN

DARRIELLE WILLIAMS

LATESHA TOWNSEND

HERBERT ODUM

KEVIN BARTHELEMY

ASHLEY EVANS

JANESSA SPAIGHTS

ALISA WALKER

ANTHONY MODESTE

SHAQUANA CRUMP

TYQUAN ROBINSON

STEPHANIE PIERRE

CRYSTAL RIVERA

GLORIA BUCKNER

WILLIE PETTEWAY



TANIEKA SCOTT  
TYRONE FOSTER  
CHERISH HURLEY  
JERRELL MITCHELL  
HECTOR MOLINA  
TYRONE COBB  
ROSA CIRINO  
ESTER HAILU  
RONNELL OLIVER  
TY-MEEK THELWELL  
MARVIN DUMONT  
ISIAH LUNDY  
BENJAMIN PETTIFORD  
STEVEN HEROD  
KAREEM CARTER  
JERROD ABNEY  
DANIEL SLADE  
DARRELL RICHARDSON  
DASHAWN LYNCH  
ZULIKA HOSTEN  
JULIUS ANDERSON  
ESTERLIN SAMUEL  
and  
QUANMIK WELLS

between on or about February 1, 2011, and on or about August 27, 2012, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, did purposely obtain the property of another, in an amount of \$500 or more, by deception, that is JAN CEDENO, KENDUE WYCHE, WAYNE SETTLE, KASEEM HARRIS, JASMINE LANE, MATTHEW HAMILTON, TANASIA STOKELY, JARON MCEACHIN, DARRIELLE WILLIAMS, LATESHA TOWNSEND, HERBERT ODUM, KEVIN BARTHELEMY, ASHLEY EVANS, JANESEA SPAIGHTS, ALISA WALKER, ANTHONY MODESTE, SHAQUANA CRUMP, TYQUAN ROBINSON, STEPHANIE PIERRE, CRYSTAL RIVERA, GLORIA BUCKNER, WILLIE PETTEWAY, TANIEKA SCOTT, TYRONE FOSTER, CHERISH HURLEY, JERRELL MITCHELL, JERRELL MITCHELL, HECTOR MOLINA, TYRONE COBB, ROSA CIRINO, ESTER HAILU, RONNELL OLIVER, TY-MEEK THELWELL, MARVIN DUMONT, CHRISTOPHER ALLARD, ISIAH LUNDY, BENJAMIN PETTIFORD, STEVEN HEROD, KAREEM CARTER, JERROD ABNEY, DANIEL SLADE, DARRELL RICHARDSON, DASHAWN LYNCH, ZULIKA HOSTEN, JULIUS ANDERSON, ESTERLIN SAMUEL and QUANMIK WELLS did create or reinforce the false impression that they were the legitimate and authorized account holders of various JP Morgan Chase Bank accounts and were thereby authorized to access, link, transfer funds and order additional credit cards to withdraw money from said accounts,

WHEREAS IN TRUTH AND IN FACT, as JAN CEDENO, KENDUE WYCHE, WAYNE SETTLE, KASEEM HARRIS, JASMINE LANE, MATTHEW HAMILTON,

TANASIA STOKELY, JARON MCEACHIN, DARRIELLE WILLIAMS, LATESHA TOWNSEND, HERBERT ODUM, KEVIN BARTHELEMY, ASHLEY EVANS, JANESEA SPAIGHTS, ALISA WALKER, ANTHONY MODESTE, SHAQUANA CRUMP, TYQUAN ROBINSON, STEPHANIE PIERRE, CRYSTAL RIVERA, GLORIA BUCKNER, WILLIE PETTEWAY, TANIEKA SCOTT, TYRONE FOSTER, CHERISH HURLEY, JERRELL MITCHELL, JERRELL MITCHELL, HECTOR MOLINA, TYRONE COBB, ROSA CIRINO, ESTER HAILU, RONNELL OLIVER, TY-MEEK THELWELL, MARVIN DUMONT, CHRISTOPHER ALLARD, ISIAH LUNDY, BENJAMIN PETTIFORD, STEVEN HEROD, KAREEM CARTER, JERROD ABNEY, DANIEL SLADE, DARRELL RICHARDSON, DASHAWN LYNCH, ZULIKA HOSTEN, JULIUS ANDERSON, ESTERLIN SAMUEL and QUANMIK WELLS well knew, they used the personal identifying information of the authorized JP Morgan Chase bank account holders to unlawfully access, link, transfer funds, and order additional credit cards to withdraw money from said accounts, in an amount in excess of \$500, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Money Laundering - Third Degree)

JAN CEDENO

KENDUE WYCHE

WAYNE SETTLE

KASEEM HARRIS

JASMINE LANE

MATTHEW HAMILTON

TANASIA STOKELY

JARON MCEACHIN

DARRIELLE WILLIAMS

LATESHA TOWNSEND

HERBERT ODUM

KEVIN BARTHELEMY

ASHLEY EVANS

JANESSA SPAIGHTS

ALISA WALKER

ANTHONY MODESTE

SHAQUANA CRUMP

TYQUAN ROBINSON

STEPHANIE PIERRE

CRYSTAL RIVERA

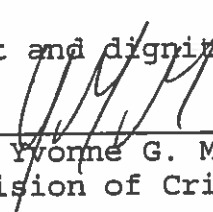
GLORIA BUCKNER

WILLIE PETTEWAY

TANIEKA SCOTT  
TYRONE FOSTER  
CHERISH HURLEY  
JERRELL MITCHELL  
HECTOR MOLINA  
TYRONE COBB  
ROSA CIRINO  
ESTER HAILU  
RONNELL OLIVER  
TY-MEEK THELWELL  
MARVIN DUMONT  
ISIAH LUNDY  
BENJAMIN PETTIFORD  
STEVEN HEROD  
KAREEM CARTER  
JERROD ABNEY  
DANIEL SLADE  
DARRELL RICHARDSON  
DASHAWN LYNCH  
ZULIKA HOSTEN  
JULIUS ANDERSON  
ESTERLIN SAMUEL  
and  
QUANMIK WELLS

between on or about February 1, 2011, and on or about August 27, 2012, at the City of Atlantic City, in the County of Atlantic; in the State of New York; elsewhere and within the jurisdiction of this Court, did commit the offense of Money Laundering, in that JAN CEDENO, KENDUE WYCHE, WAYNE SETTLE, KASEEM HARRIS, JASMINE LANE, MATTHEW HAMILTON, TANASIA STOKELY, JARON MCEACHIN, DARRIELLE WILLIAMS, LATESHA TOWNSEND, HERBERT ODUM, KEVIN BARTHELEMY, ASHLEY EVANS, JANESEA SPAIGHTS, ALISA WALKER, ANTHONY MODESTE, SHAQUANA CRUMP, TYQUAN ROBINSON, STEPHANIE PIERRE, CRYSTAL RIVERA, GLORIA BUCKNER, WILLIE PETTEWAY, TANIEKA SCOTT, TYRONE FOSTER, CHERISH HURLEY, JERRELL MITCHELL, JERRELL MITCHELL, HECTOR MOLINA, TYRONE COBB, ROSA CIRINO, ESTER HAILU, RONNELL OLIVER, TY-MEEK THELWELL, MARVIN DUMONT, CHRISTOPHER ALLARD, ISIAH LUNDY, BENJAMIN PETTIFORD, STEVEN HEROD, KAREEM CARTER, JERROD ABNEY, DANIEL SLADE, DARRELL RICHARDSON, DASHAWN LYNCH, ZULIKA HOSTEN, JULIUS ANDERSON, ESTERLIN SAMUEL, QUANMIK WELLS, and others whose identities are both known and unknown to the Grand Jurors, did transport or possess property known or which a reasonable person would believe to be derived from criminal activity, that is Theft by Deception, contrary to the provisions of N.J.S.A. 2C:20-4, or did engage in transactions involving property known to be derived from criminal activity, with the intent to facilitate or promote the criminal activity, or knowing that the transactions were designed in whole or in

part to conceal or disguise the nature, location, source, ownership or control of the property derived from the criminal activity; that is they and others whose identities are both known and unknown to the Grand Jurors, did link legitimate JP Morgan Chase bank accounts to fraudulent JP Morgan Chase account, did transfer funds from the legitimate accounts to the fraudulent accounts, did withdraw money from the fraudulent accounts through wire transfers and Global Cash Access withdrawals at Atlantic City casinos, did contact JP Morgan Chase Bank and pose as the legitimate owners of JP Morgan Chase Bank accounts, did request additional credit cards for the accounts, did withdraw money from the accounts using these credit cards through Global Cash Access withdrawals at Atlantic City casinos, and then used a portion of those funds to pay the individuals who set up the fraudulent accounts or picked up the wires and made the Global Cash Access withdrawals and to perpetuate their ongoing criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a, N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

  
DAG Yvonne G. Maher  
Division of Criminal Justice

A TRUE BILL:

  
Foreperson

Date: APR 21 2016